

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:18-CR-708
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	
)	
KENNETH TYSON,)	<u>DEFENDANT’S UNOPPOSED MOTION</u>
)	<u>TO MODIFY BOND CONDITIONS</u>
Defendant.)	

Defendant Kenneth Tyson, through his undersigned counsel, respectfully moves for a modification of his bond conditions to permit him to travel out of the Northern District of Ohio between February 24–28, 2019, for a medical procedure in the Southern District of New York. A memorandum in support of this Motion is attached. The Government does not oppose this Motion.

Respectfully submitted,

/s/ Chris N. Georgalis
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Attorney for Defendant Kenneth Tyson

MEMORANDUM IN SUPPORT

On December 7, 2018, this Honorable Court set an unsecured appearance bond limiting Mr. Tyson's travel to the Northern District of Ohio. (Order Setting Conditions of Release, Doc. 5, PageID# 21.). Mr. Tyson is under the care of a medical doctor in the Southern District of New York regarding a prospective medical procedure. Due to the nature of the procedure, the physicians cannot predict precisely when the procedure will need to take place until shortly before the procedure. Today, his physician informed him that the medical procedure will need to take place on either February 25, 26, or 27, 2019.

As such, Mr. Tyson requests that he be permitted to travel out of the Northern District of Ohio between February 24–28, 2019, for purposes of traveling to the Southern District of New York, undergoing the medical procedure there, and traveling home. AUSA Carmen Henderson has been notified of this request, and she was provided details about the nature of the medical procedure. The Government has no objection to the granting of this request.

WHEREFORE, Defendant Kenneth Tyson respectfully requests than an Order issue to permit Defendant to travel out of the Northern District of Ohio between February 24–28, 2019, for the purpose of undergoing a medical procedure in the Southern District of New York.

Respectfully submitted,

/s/ Chris N. Georgalis
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Attorney for Defendant Kenneth Tyson

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2019, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

/s/ Chris N. Georgalis
Christos N. Georgalis

Attorney for Defendant Kenneth Tyson